

Jennie Lee Anderson (SBN 203586)
Lori E. Andrus (SBN 205816)
ANDRUS ANDERSON LLP
155 Montgomery Street, Suite 900
San Francisco, California 94104
Telephone: 415-986-1400
jennie@andrusanderson.com
lori@andrusanderson.com

Adam J. Levitt (*pro hac vice*)
DICELLO LEVITT & CASEY LLC
Ten North Dearborn Street, Eleventh Floor
Chicago, Illinois 60602
Telephone: (312) 214-7900
alevitt@dlcfirm.com

W. Daniel "Dee" Miles, III (*pro hac vice*)
**BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.**
272 Commerce Street
Montgomery, Alabama 36104
Telephone: 334-269-2343
Dee.Miles@beasleyallen.com

Attorneys for Plaintiffs (*additional counsel appear on signature page*)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MONTEVILLE SLOAN, JR., RAUL
SIQUEIROS, TODD AND JILL CRALLEY,
JOSEPH BRANNAN, LARRY GOODWIN,
MARC PERKINS, DONALD LUDINGTON,
THOMAS SHORTER, DERICK BRADFORD,
GABRIEL DEL VALLE, KEVIN HANNEKEN,
EDWIN AND KATELYN DOEPEL, DAN
MADSON, JAMES FAULKNER, JOSEPH
OLIVIER, SCOTT SMITH, ROSS DAHL,
DREW PETERSON, MICHAEL WARE,
STEVE KITCHEN, JOHN NEUBAUER,
BARBARA MOLINA, DENNIS VITA,
STEVEN EHRKE, BILL MAUCH, THOMAS
GULLING, RONALD JONES, MIKE
WARPINSKI, JOHN GRAZIANO, JOSHUA
BYRGE, RUDY SANCHEZ, CHRISTOPHER
THACKER, RANDY CLAUSEN, KELLY
HARRIS, JAMES ROBERTSON, and JONAS
BEDNAREK, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER
REGARDING MODIFICATION OF CASE
SCHEDULE**

Judge: Hon. Edward J. Chen

1 WHEREAS the Court has set deadlines for the completion of fact discovery and class certification
2 motion practice (Dkt. No. 113);

3 WHEREAS the current deadline for the completion of fact discovery is November 16, 2018;

4 WHEREAS Plaintiffs served their first set of document requests on February 12, 2018 and GM
5 served timely written responses;

6 WHEREAS Defendant General Motors LLC ("GM") produced its first batch of responsive
7 documents (5,800 pages) on July 21, 2018 and anticipates that rolling production of documents from the
8 current slate of custodians that are responsive to the requests Plaintiffs have served so far will continue
9 for approximately 60 days;

10 WHEREAS the Parties engaged in extensive correspondence and discussion to resolve various
11 discovery issues, including Plaintiffs' request that GM search the files of ten additional custodians, in an
12 effort to avoid burdening Magistrate Judge Spero with the Parties' disputes;

13 WHEREAS the Parties' counsel conducted a July 17, 2018 videoconference to meet and confer
14 regarding, among other things, the custodians from whom GM intends to produce documents and a
15 timetable for GM's document production;

16 WHEREAS GM has agreed to produce documents in the possession of the ten additional
17 custodians;

18 WHEREAS, given the anticipated volume of documents to be produced and the timing thereof,
19 Plaintiffs have indicated that they need additional time to review GM's production and then conduct any
20 depositions and necessary follow-up discovery, including requests for admissions or additional document
21 requests, prior to the current fact discovery cut-off;

22 WHEREAS the Parties request the following adjustments to the current discovery and class
23 certification motion practice schedule;

24 THEREFORE, IT IS STIPULATED by Plaintiffs and GM, through their counsel of record,
25 subject to the approval of the Court, as follows:

- 26 1. The fact discovery cut-off and the deadline to file a motion to amend the pleadings are
27 extended from November 16, 2018 to **March 16, 2019**;

2. The deadline for Parties to substantially complete their document productions is extended from October 5, 2018 to **November 8, 2018**;
3. The deadline for Plaintiffs' Motion for Class Certification and Plaintiffs' Rule 26(a)(2) Class Certification Expert Disclosures/Reports is extended from December 20, 2018 to **April 18, 2019**;
4. The deadline for GM's Opposition to Motion for Class Certification and GM's Rule 26(a)(2) Class Certification Expert Disclosures/Reports is extended from March 15, 2019 to **July 18, 2019**;
5. The deadline for Plaintiffs' Reply in Support of Motion for Class Certification and Plaintiffs' Rebuttal Class Certification Expert Disclosures/Reports is extended from April 29, 2019 to **August 22, 2019**;
6. The date of the hearing on Motion for Class Certification is moved from May 16, 2019 to **September 19, 2019**; and (at 1:30 p.m.)
7. The deadline for the completion of private mediation is extended through **April 2019**, consistent with the extension of the discovery cut-off.

Dated: July 26, 2018

/s/ Joseph J. Ybarra
Joseph J. Ybarra
HUANG YBARRA GELBERG & MAY LLP
550 South Hope Street, Suite 1850
Los Angeles, California 90071
Telephone: 213-884-4900
Joseph.ybarra@hygmlaw.com

Gregory R. Oxford
ISAACS CLOUSE CROSE & OXFORD LLP
21515 Hawthorne Boulevard
Suite 950
Torrance, California 90503
Telephone: 310-316-1990
goxford@icclawfirm.com

Counsel for Defendant General Motors LLC

/s/ J
Adam J. Levitt (*pro hac vice*)
John E. Tangren (*pro hac vice*)
Daniel R. Ferri (*pro hac vice*)
DICELLO LEVITT & CASEY LLC
Ten North Dearborn Street, Eleventh Floor
Chicago, Illinois 60602
Telephone: 312-214-7900
alevitt@dlcfirm.com
jtangren@dlcfirm.com
dferri@dlcfirm.com

1 W. Daniel "Dee" Miles, III (*pro hac vice*)
2 H. Clay Barnett, III (*pro hac vice*)
3 Archie I. Grubb, II (*pro hac vice*)
4 Andrew E. Brashier (*pro hac vice*)
5 **BEASLEY, ALLEN, CROW,**
6 **METHVIN, PORTIS & MILES, P.C.**
7 272 Commerce Street
8 Montgomery, Alabama 36104
9 Telephone: 334-269-2343
10 Dee.Miles@Beasleyallen.com
11 Clay.Barnett@BeasleyAllen.com
12 Archie.Grubb@Beasleyallen.com
13 Andrew.Brashier@Beasleyallen.com

14 Jennie Lee Anderson
15 Lori E. Andrus
16 **ANDRUS ANDERSON LLP**
17 155 Montgomery Street, Suite 900
18 San Francisco, California 94104
19 Telephone: 415-986-1400
20 jennie@andrusanderson.com
21 lori@andrusanderson.com

22 Nicholas R. Rockforte (*pro hac vice*)
23 Christopher L. Coffin (*pro hac vice*)
24 **PENDLEY, BAUDIN & COFFIN, L.L.P.**
25 1515 Poydras Street, Suite 1400
26 New Orleans, Louisiana 70112
27 Telephone: 504-355-0086
28 nrockforte@pbclawfirm.com
ccoffin@pbclawfirm.com

Marcus Rael (*pro hac vice*)
ROBLES, RAEL & ANAYA, P.C.
500 Marquette NW, Suite 700
Albuquerque, New Mexico 87102
Telephone: 505-242-2228
marcus@roblesrael.com

Anthony J. Garcia, Esq. (*pro hac vice* motion to
be filed)
AG LAW
742 South Village Circle
Tampa, Florida 33606
Telephone: 813-259-9555
anthony@aglawinc.com

Timothy J. Becker (*pro hac vice* motion to be
filed)
JOHNSON BECKER, PLLC
444 Cedar Street, Suite 1800
St. Paul, Minnesota 55101
Telephone: 612-436-1800
tbecker@johnsonbecker.com

Ben Finley (*pro hac vice* motion to be filed)

THE FINLEY FIRM, P.C. 200 13th Street
Columbus, Georgia 31901
Telephone: (706) 322-6226
bfinley@thefinleyfirm.com

Eric J. Haag (*pro hac vice* motion to be filed)
ATTERBURY, KAMMER, & HAAG, S.C.
8500 Greenway Boulevard, Suite 103
Middleton, Wisconsin 53562
(608) 821-4600
ehaag@wiscinjurylawyers.com

Counsel for Plaintiffs and the Proposed Classes

1 **ECF CERTIFICATION**

2 Pursuant to Civil L.R. 5-1(i)(3), the filing attorney attests that she has obtained concurrence
3 regarding the filing of this document from the signatories to the document.
4

5 Date: July 25, 2018

6 By: /s/ Jennie Lee Anderson
7 Jennie Lee Anderson
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The 8/23/18 Further CMC is vacated. Next CMC remains set for 11/15/18 at 10:30 a.m.
Updated joint CMC Statement due 11/8/18.

Dated this 13th day of August, 2018

